

SECTION 3

ELIGIBILITY GUIDANCE AND MEAL COUNTING PROCEDURES

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FREE AND REDUCED-PRICE APPLICATION PROCESS

Each year the USDA issues Income Eligibility Guidelines to be used from July 1 to June 30 of the fiscal year to determine eligibility for free or reduced-price meals and free milk. Each sponsor must follow established policies for free and reduced-price meals or free milk for children unable to pay the full price. Each sponsor is required by regulations to submit to the CNP office its policy and criteria used for determining meal or milk eligibility. A Free and Reduced-Price Policy Statement is included in the application packet for participation in the National School Lunch, School Breakfast or Special Milk Programs.

At the beginning of the school year, a free and reduced-price application and parent letter must be distributed to all households. LEA's are required to utilize the household based income applications, individual student applications are no longer acceptable. Applications should be distributed on or about the beginning of the school year (no more than 30 days prior). They should not be sent with registration packets at the end of the school year. For year round schools, applications can not be distributed before July 1st. Eligibility is determined in one of two ways: (1) income eligibility, in which a determination is based on household size and income; or (2) categorical eligibility, in which children from families receiving food stamps, Cash Assistance, FDPIR benefits, or homeless, migrant or runaway youth are automatically eligible for free meals. A child who is enrolled in a Head Start program as a participant as part of the "funded enrollment" or meeting the Head Start low-income criteria are eligible for free meal benefits. The Head Start statement of income eligibility issued upon initial enrollment will be sufficient documentation of automatic eligibility, or a list of names of the income eligible Head Start children and a statement certifying that those children "are currently enrolled as participants in the program based on a determination that the children are from households that meet the low-income criteria." It also must include the signature of a Head Start employee authorized to provide certification.

A determination must be made within 10 operating days of the receipt of the application. Whenever possible, applications should be processed immediately, particularly for new students who do not have approved applications on file from the previous year. Once an application has been determined to be complete, a notification letter for school meals is sent to the household. The notification letter states the approval status and includes the name of the hearing official. The notification letter developed by the sponsor has the option of stating, "This notification letter may qualify your child for other benefits such as educational scholarships, fee waivers, and specific educational programs. Take this letter to the district office (or other agency office) for more information on these benefits." Sample applications, parent letters and notification letters are in the appendices of the *Free and Reduced-Price Policy Handbook*.

The sponsor must have a valid application or Direct Certification form on file for each student eligible for free or reduced-price benefits. Information on the free and reduced-price application is confidential, only to be used for program purposes. Names of children MUST NOT be published, posted, announced or shared unless authorized by the parent on a multi-use application or as allowed by the *Free and Reduced-Price Policy Handbook*. Approved applications from the previous year may only be used for 30 operating days after the beginning of the school year. Once the LEA determines the students' eligibility for the current school year, it is valid for the entire

school year. A *Free and Reduced-Price Policy Handbook* is issued and updated yearly by the CNP office to assist with these determinations.

DIRECT CERTIFICATION

It is mandatory that all Child Nutrition Program School Food Authorities match for eligible children at least once within the first 30 operating days of the current school year. Matching may not be conducted prior to July 1st of the current school year, and may not be conducted more than 30 calendar days prior to the first day of school. Match results that certify children for free meals must be placed into effect within three calendar days of receiving the match results. Households of children matched for free meals must be notified of their free meal benefits within ten days of certifying the child for free meals.

Schools are required to distribute applications no earlier than July 1st of each school year to all children in attendance at school who were not determined eligible through Direct Certification match results.

Note: Schools must distribute income applications to the remaining students in a manner that prevents overt identification and ensures that no child is inadvertently excluded from participation.

For more information on the Direct Certification regulations and procedures, refer to *CNP Direct Certification Guidance Manual*.

FOREIGN LANGUAGE TRANSLATIONS

When a significant percentage of the population eligible to be served by the sponsor need information in a language other than English, the sponsor must make reasonable efforts to send the appropriate foreign language letters/notices and application forms to such households. Schools are encouraged to provide households with assistance in completing applications through the use of foreign language personnel. A variety of foreign language translations are available upon request from the CNP office.

MULTI-USE APPLICATIONS

The sponsor has the option of implementing a multi-use application to provide households greater access to other means-tested programs and benefits. To protect the household's rights to privacy while allowing the application to be used for more than the school nutrition programs, the application must allow the household to specifically waive the right to confidentiality. Sponsors wishing to use a multi-program application must adhere to guidelines regarding the waiver of confidentiality (Exhibit A) when designing the application. The CNP office must approve the multi-use application before use to ensure all of the required elements are present.

KIDSCARE/MEDICAID/AHCCCS

Local education agencies have the option of sharing their free and reduced information with the state health care insurance agencies for children as it is likely that if a student qualifies for free or reduced meals, they will qualify for low cost health insurance. LEA's need to inform the

households of their intent to share this information with KidsCare/Medicaid/AHCCCS. ADE has a letter available for LEA's to send to households allowing them an opportunity to opt out of sharing this information. For more information on KidsCare/Medicare/AHCCCS refer to the '*Free and Reduced Price Policy Guidance Manual.*'

VERIFICATION

Verification is confirmation of eligibility, based on the free and reduced-price application, for free and reduced-price meals under the NSLP. Verification is a critical part of NSLP because on any given day, over 14 million meals are served free or at reduced-price. Free and reduced-price school meals represent an important component of this nation's nutrition safety net for needy children. Yet several data sources, including the results of local schools' verification activities, indicate the misinformation provided by some households results in the approval of a significant number of children for free and reduced-price meals who are not eligible for those meals. Since many schools are increasingly using free and reduced-price certifications as the basis for targeting funding for federal, state and local education programs, the approval of ineligible children represents a significant mistargeting of federal, state and in some cases, local funds.

The sponsor's certification and verification efforts must be consistent with current program rules and guidance, and designed to certify only eligible students. Please refer to the *Free and Reduced Priced Policy Handbook*, for detailed information on the verification process. **Verification reports are to be completed on ADE's Common Logon by March 1st of each year.**

Verification must include either confirmation of income eligibility or confirmation that the child is included in a currently certified FDPIR household.

Verification of eligibility is not required for children who have been certified using direct certification system, students in residential child care institutions (RCCIs), or students participating in the Special Milk Program. However, the total number of DES direct certification households on file must be reported on the verification report.

Verification of the minimum required sample size must be completed by **November 15th**. The LEA must then collect and report the number of students who were terminated as a result of verification, but who were reinstated as of February 15th. Finally, the verification report must be completed on ADE's Common Logon by March 1st of each school year. Additionally, the LEA must maintain copies of the verification report and all supporting documentation for a minimum of 3 years.

BENEFIT ISSUANCE DOCUMENT

The benefit issuance document is the link between the eligibility determination and how a meal will be claimed for reimbursement. The benefit issuance document must be maintained and updated on a continual basis, documenting students' eligibility status based on the current, approved free and reduced-price application or Direct Certification form. Withdrawn students should be removed, or otherwise indicated, on the benefit issuance document. The sponsor must ensure that students identified as free or reduced-price on the document are counted in that category at the point of service.

MEAL COUNT SYSTEM

Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals actually served to students by category, i.e., paid, reduced-price, and free, at the point of service. The number of meals claimed for reimbursement must have adequate documentation on file to support the claim. For detailed information on Meal Counting and Claiming, refer to the USDA's *Meal Counting and Claiming Manual* and video, FNS 270, April 1991. See Exhibit B for advantages and disadvantages of a variety of meal count systems.

Point of Service

The point of service is that point in the food service operation where it can be determined that a free, reduced-price or paid meal meeting the meal requirements has been served to an eligible student.

For every point of service there must be only one site application and therefore one corresponding reimbursement claim.

Exception: Schools that have separate Head Start/Preschool operations on their campus to which they deliver meals must treat those operations as a second point of service. The Head Start/Preschool must perform accurate meal counts that are reported and consolidated with the Host School's reimbursement claim. The Host School may not claim reimbursement on meal delivery counts, but instead must use the provided meal counts.

Point of Service Meal Counts

Lunch and Breakfast

Meals are counted at the point of service where it can be accurately determined that a reimbursable meal has been served to an eligible student.

There are different ways to count meals served by category. The procedure must ensure that meals counted: (1) meet the meal pattern requirements, (2) are served to eligible students, (3) are counted daily by category and (4) all systems must prevent overt identification. Also, only one meal per student per meal service may be claimed for reimbursement. Adult meals, a la carte items, snacks (unless approved for the After School Care Snack Program), dinners and second meals are not reimbursable and should be accounted for separately.

Snacks

Sites that are located in areas served by a sponsor and have at least 50 percent of the enrolled children certified for free or reduced-price meals are eligible to receive reimbursement at the free rate for all snacks served regardless of each child's eligibility for free or reduced-price lunch. A total meal count of the number of students receiving a snack must be recorded daily.

Sites which are not in areas served by a school in which at least 50 percent of the enrolled children are certified eligible for free or reduced price meals must count snacks and claim reimbursement by type (free, reduced-price, or paid) for each student, and must have documentation of eligibility.

Medium of Exchange

The medium of exchange includes any type of ticket, token, ID, name or number that is issued to the students for obtaining a meal. The meal count/collection system selected must ensure that the medium of exchange prevents overt identification of free and reduced-price meal recipients in the coding, distribution, and collection process.

Suggested Coding

When determining how the medium of exchange will be coded, consider the following suggested coding methods:

<u>Method</u>	<u>Examples</u>
Coding series	10 through 1,999 free/2,000 through 3,999 reduced/4,000 through 5,999 paid.
Coding by variations	Variations in signatures, placement of date, or ticket distributor such as Mary Smith, Mary J. Smith, and M. Smith.
Coding by subtle differences	Differences in printing such as capital letter, period, spacing of a line, or differences in underlining.
Coding by number of digits	Four digits for free, five digits for reduced price or six digits for paid.

Additional suggestions include changing the medium of exchange coding system yearly to prevent the use of a previous year's tickets and tokens. Do not use a single-symbol code such as A, B, C; X, Y, Z; or 1, 2, 3. Single-symbol codes are most easily recognized by students.

Color-coding by category and single-symbol coding using obvious identifiers such as F, R, P are prohibited.

Daily Reporting

1. Take a physical count at the point of service of meals actually served. Attendance records may not be used.
2. Record meals on a daily basis by category (free, reduced-price, or paid).
3. Daily Edit Checks - The sponsor is to conduct daily checks at each site to ensure the number of children currently eligible for free, reduced-price and paid meals, times the sponsor's attendance factor, do not exceed the meal count for the day. See Exhibits E for suggested formats to record edit checks.
4. If a student charges his meal, the meal is recorded by category on the day that it is served and not on the day the meal is paid. A charged meal is NOT counted as a free meal.
5. Claim the student worker meals the same as any other student meals. Student workers eligible for free meals are claimed as "free," those eligible for reduced-price are claimed as "reduced," and those not eligible for free or reduced-price are claimed as "paid."
6. Where schools receive meals from a vendor or a central kitchen, record only those meals actually served, not the number delivered.
7. Adult meals are not reimbursable. However, record in separate categories all adult food service worker meals and other nonprogram adult meals such as teachers and visitors.

Instructions and sample forms are provided for daily recording of meals and meal count summarizing for the claim. See Exhibits C and D.

Special Assistance

Special Assistance is a paperwork reduction option available to sponsors that have high percentages of their enrollment eligible for free or reduced-price meals. There are three variations of Special Assistance: Provision 1, Provision 2 and Provision 3. All three provisions allow for a reduction in the frequency that income applications need to be collected from households. Provisions 2 and 3 also allow for simplified meal counting procedures. Sponsors must be approved to participate in Special Assistance and approval is contingent upon having an accurate income application approval system and accurate meal counting system. Refer to the *Special Assistance* handbook for descriptions of the provisions.

ACCOUNTABILITY REQUIREMENTS

Accountability Procedures

It is recommended that written, detailed instructions on the operation of the meal count system be developed and provided to all responsible personnel. These instructions should state how, when, and where a duty is to be performed and which position is responsible. At a minimum, the following duties should be described: determination of free and reduced-price eligibility; verification of income applications; cash collection system; meal count system, including daily edit checks; and completion of the reimbursement claim. See Exhibit F for suggested format.

Staff Training

All personnel involved in the meal count system must receive training to ensure they can adequately perform their duties. At a minimum, an annual workshop or training session should be conducted for all appropriate personnel. New and substitute staff members should also receive orientation on their duties and responsibilities.

Training should cover the following topics: meal pattern requirements; offer versus serve; cash collection system; meal count system; daily and weekly reports; charge policy; lost, stolen, and misused tickets; adult sales; and a la carte/snack bar sales.

Training must be documented, including name(s) and title(s) of instructors, dates, topics covered, and attendees. See Exhibit G.

On-Site Review

Sponsors participating in the National School Lunch Program must conduct a site review at each site prior to February 1 of each year. **Single-site sponsors are exempt from this requirement.** The purpose of the site visit is to review the meal counting and claiming procedures as they are actually performed. A sponsor may develop its own review form or use the sample form provided. If out of compliance, a sponsor has 45 days to follow-up. See Exhibit H.

On-Site After School Care Snack Program Review

A sponsor operating the After School Care Snack Program must have a review for each program two times a year. The first review shall be during the first four weeks of the school year that the program is in operation. Year round schools or year round residential child care institutions should review the program during the first four weeks of its initial year of operation, once more during its first year of operation, and twice each year thereafter. The sponsor should keep the review forms on file. See Exhibit I.

CHILD NUTRITION PROGRAMS

MULTI-USE FREE AND REDUCED-PRICE APPLICATION

Guidelines for Waiver of Confidentiality

1. The waiver must advise the household that this information provided on the application will be used for eligibility determinations for programs other than school nutrition programs.
2. The waiver must precisely identify the agencies the information will be shared with and for what purposes.
3. The application must state that the signing of the waiver must not be construed by the applicant or the program administrator as an additional requirement or a prerequisite for participation in any of the school nutrition programs.
4. The applicant must be able to limit the waiver to encompass only those programs to which he or she wishes to apply. For example, the application could use a check-off system under which the applicant would check or initial a box to indicate that he or she wants to apply for benefits from a particular program.
5. Although the application for school meals or milk may be signed by any adult household member, the application must state that the waiver of confidentiality must be signed by the parent or legal guardian of the child.
6. The social security number notice required by the Privacy Act of 1974 must be modified. In addition to the current statement, applicants must be informed that while other programs on the multi-use application may not require social security numbers as a condition of eligibility, once provided, the social security number may be used by the other programs. If any other program plans to use social security numbers for any purpose, a statement of those uses must be included.
7. The state agency or Local Education Agency must ensure, in writing, that entities receiving information from the multi-use application limit the use of such information to the purposes specified on the application. This may be done through a Memorandum of Understanding with the agency or agencies who will receive the information. This is to ensure that the household's rights to privacy are respected by using the information only for the purposes agreed to.

OTHER PROGRAMS USING THE MULTI-USE APPLICATION MAY NEED ADDITIONAL OR FOLLOW-UP INFORMATION. THIS SHOULD BE DONE OUTSIDE OF THE MULTI-USE APPLICATION.

MEAL COUNT SYSTEMS

MANUAL SYSTEMS	
Roster/Verbal Identifier	<p>Students have some type of identifier; name or ID number. Documentation of meal count is produced during meal service as names/number are checked off on roster or number sheet. This system can be effective with small schools</p> <p>Advantages: Counts by category are taken simultaneously with the actual meal count</p> <p>Disadvantages: Students may forget their ID numbers slowing down the line.</p> <p>System can be time consuming for cashiers where students do not arrive by class.</p>
Coded Ticket/Token	<p>Students present ticket or token to cashier. Tickets or Tokens are then physically counted by category at the end of the meal service. This system can be effective when used in small-to-medium schools. In large schools, this system may be too cumbersome.</p> <p>Advantages: If tickets are coded to reflect eligibility categories of students, counting tickets collected at the point of service provides a total meal count and count by category at the same time.</p> <p>Disadvantages: Tickets or tokens can be destroyed, transferred, stolen, or sold.</p> <p>If not coded properly, overt identification may occur.</p>
Coded ID Cards	<p>Students are issued ID cards that are coded to indicate meal eligibility. The cards are presented to the cashier and marked on the roster or list or keyed into a cash register.</p> <p>Advantages: Not easily transferred if photo is on the card and can be used for both a student ID for other school functions which can be a savings to the school district.</p> <p>Disadvantages: Cards can be lost, stolen, or destroyed.</p>

AUTOMATED SYSTEMS	
Automated Tab	<p>Students present tickets that have been coded and sectioned (“tabbed”) to cashier who inserts the tabbed tickets into the programmed register or automated terminal and the section is cut off by the machine. The machine reads the number of the tab and counts each meal served by category. The total meals served at the end of the meal service.</p> <p>Advantages: Saves time because count is taken simultaneously with the collection of tickets.</p> <p>Disadvantages: Tickets can be lost, stolen, destroyed, or transferred.</p>
Bar Codes	<p>A specific bar code is designated for each student identifying their eligibility information. The bar codes are either on a computerized scan card issued to students or on a computerized scan sheet. Students verbally identify themselves, show identification, or presents card to cashier. The cashier passes a scanner wand or other automated instrument over the student’s bar code on the computerized “scan “ sheet and the meal count by category is made automatically from the computer. Students may also have a card with a barcode on it that they run through a magnetic device that reads the code.</p> <p>Advantages: Prevents overt identification on the line.</p> <p>Disadvantages: If more than one service line is used and the machines are not electronically linked than there is a possibility of two meals being claimed.</p> <p>If students are issued cards, they can be lost, stolen, or destroyed.</p>
Computerized Cards	<p>Students are issued a computerized card with a magnetic strip (similar to a credit card) that the computer reads automatically identifying the students eligibility. The system is set up like a debit card system where families prepay on a weekly or monthly basis and the amount purchased is deducted from the prepaid account.</p> <p>Advantages: Time is often saved because the system provides meal counts by category automatically at the point of service.</p> <p>Disadvantages: If students are issued cards, they can be lost, stolen, or destroyed.</p>

Automated systems often have the ability to generate necessary reports automatically.

*All automated systems have the possibility of computer failure. A back up system must be in place if this should occur.

SUMMARY OF MEALS SERVED/NAME CHECK OFF SYSTEM**I N S T R U C T I O N S**

Children's meals are to be recorded **daily** as they are ACTUALLY SERVED. Attendance records are **not** to be used for calculating the number of meals served to children for the month. A master copy could be made listing children's names, coded by category, in alphabetical order by teacher, grade, etc. Leave space for adding new students. The list must be updated on a current basis when withdrawals and transfers are made.

Daily Recording:

1. As child goes through the serving line, teacher or clerk will check the box for correct day on the Summary of Meals form. (See exhibit D)
2. Daily record the number of free, reduced and paid meals served and compare to students eligible by category times the attendance factor (Exhibit E).

End-of-Month (EOM) Totals:

1. At the end of month, total the number of meals each child was served.
2. Post total in the column that denotes the child's eligibility status.
3. Post the totals on the Summary of Meals Served Worksheet to post to the claim.

School _____

Summary of Meals Served

Check One: ☐ Lunch

☐ Breakfast

Teacher _____ Grade _____ Month of _____ Year _____

EOM TOTALS

[illegible]

Prepared by: _____

DAILY EDIT CHECK WORKSHEET

- ☐ National School Lunch
- ☐ School Breakfast

School: _____ Enrollment (Membership): _____ Attendance Factor (AF): _____ Month: _____

Day of Month:	A Free Eligible	B AF	C Free Eligible X AF:	D Free Meals Served:	A Reduced Eligible	B AF	C Reduced Eligible X AF:	D Reduced Meals Served:	A Paid Eligible:	B AF	C Paid Eligible X AF:	D Paid Meals Served:	TOTAL COUNTS:
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
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31													

Meals Served should not exceed Eligible X Attendance Factor (AF). (Column D should not exceed column C).

SUMMARY OF MEALS SERVED

Month _____ Year _____

To be used for compiling the monthly meals served from the teachers' name check off sheets.

Teacher's Name	Number of Breakfasts Served to Students			
	Paid	Reduced	Free	Total
Totals				

Teacher's Name	Number of Lunches Served to Students				Attendance
	Paid	Reduced	Free	Total	
Totals					
Total Attendance					
÷ by Operating Days					
Average Daily Attendance					

Prepared by: Signature and Date

Prepared by: Signature and Date

FOOD SERVICE
ACCOUNTABILITY PROCEDURES

FOOD SERVICE
ACCOUNTABILITY PROCEDURES

As a participant in the National School Lunch Program and School Breakfast Program
_____ has adopted the following procedures for
compliance with USDA accountability regulations.

AGENCY

_____	_____
LOCAL	EDUCATION

DATE	

FOOD SERVICE
ACCOUNTABILITY PROCEDURES

FREE AND REDUCED-PRICE APPLICATIONS

1. Applications for free and reduced-price meal benefits with an accompanying letter explaining the program will be distributed to every student or household in the school/district.

WHO

WHEN

HOW

2. Returned applications will be dated and evaluated for completeness and eligibility within ten days of receipt of the application. Incomplete applications will be returned for missing information. A complete application will include: name(s) of student(s); food stamp/CA/FDPIR case number or income by source of that income; social security number of the adult signing the application or indication that the person does not have a social security number.

WHO

WHEN

WHERE

3. Free and reduced price applications from the previous school year will be honored until _____, (no later than 30 operating days from the start of operation).
4. Priority will be given to evaluating applications of newly enrolled students while still maintaining the 10-day response time.
5. Notification of determination of eligibility for meal benefits will be sent to the parents or guardians.

WHO

WHEN

HOW

FOOD SERVICE
ACCOUNTABILITY PROCEDURES

FREE AND REDUCED-PRICE APPLICATIONS (cont.)

6. Determination of eligibility will be recorded on the application to include: type of eligibility, date of determination and initials or signature of determiner. (Sponsors using computer programs for applications may document determination by dating and signing computer generated rosters.)

WHO

WHEN

7. Temporarily approved applications will include date the benefits are to be terminated. New applications will be requested from the household at least 10 days prior to termination. After having one temporarily approved application, household will be requested to submit a statement describing how basic survival needs are met.
8. Requests for a hearing based upon determination of eligibility will be transmitted to the hearing official _____ (name) _____ immediately upon receipt. The adopted hearing procedures will be followed (See *Free and Reduced Price Policy Handbook*).
9. If incomplete, the racial/ethnic data on the application will be recorded by the determining official using best available information.
10. Rosters by school site of students eligible for meal benefits, clearly coded by category, will be maintained and updated as changes occur. At a minimum, rosters will include: name of students, grade, date of eligibility, date of withdrawal or transfer. Rosters will be available to persons responsible for issuance of the medium of exchange and/or meal counts.

WHO

WHEN

11. Free and reduced price applications will be filed in the following categories: free; temporary approvals; reduced price; withdrawals/transfers; denied. (Applications must be retrievable by school site.)

WHO

WHERE

WHEN

FOOD SERVICE
ACCOUNTABILITY PROCEDURES

FREE AND REDUCED-PRICE APPLICATIONS (cont.)

12. Confidentiality of students eligible for meal benefits **MUST** be maintained. With the exception of state or federal reviewers and auditors, this information will be available only to the following school/district personnel:

WHO _____

13. All free and reduced price applications and rosters will be retained for five years.

FREE/REDUCED PRICE VERIFICATION

1. Approved applications for free and reduced price meal benefits will be verified using the _____ sampling method. (See Exhibit J 'Determining Your Verification Method and Sampling Requirement' decision tree)
2. On October 1st the free/reduced price approved applications including all DES and FDPIR applications will be counted to determine a total number of applications.

WHO _____

(If using focused sampling): The number of approved Food Stamp/CA/FDPIR applications will be counted.

WHO _____

(If using focused sampling): The error-prone will be separated from the total income approved applications.

WHO _____

FOOD SERVICE
ACCOUNTABILITY PROCEDURES

FREE/REDUCED PRICE VERIFICATION (cont.)

3. The approved applications chosen for verification will be randomly selected using the following procedure: (Describe your random selection method)
4. Copies will be made of the applications selected for verification.

WHO _____

5. To check for accuracy of the initial determination, review the applications selected for verification prior to conducting any other verification activity. The review must be done by an individual other than the individual who made the initial determination.
 - a. If the initial determination is incorrect, the LEA must correct the household status and notify the household of the change.
 - b. If the household's status changes from free or reduced price to paid or from free to reduced price, a notice of adverse action is required.
 - c. Any application not subject to verification must be replaced by a similar application.
 - d. A LEA who uses a technology-based system when processing applications that demonstrates a high degree of accuracy may receive a waiver, if approved by ADE.

WHO _____

6. If verifying FS/CA applications, utilize the online Direct Verification System through common logon.
 - a. If the FS/CA number results in a no match, the LEA must contact the household to obtain an income application. If no application is received, then the child must be placed into the paid status and a letter of adverse action must be sent to the household.

WHO _____

7. If verifying FDPIR applications, at the LEA's discretion, contact the Local Tribal Organization (ITO) to verify household benefits.
 - e. If the FDPIR case number is invalid, the LEA must contact the household and obtain a income application. If no application is received, then the child must be placed into the paid status and a letter of adverse action must be sent to the household.

WHO _____

8. First notices of selection for verification will be prepared and sent to applicants.

WHO _____ WHEN (By first week of October)

FOOD SERVICE
ACCOUNTABILITY PROCEDURES

9. Income documentation will be reviewed as it is received. (See *Free and Reduced Price Policy Handbook* for acceptable sources of documentation.) Documentation for all sources of income listed on the application must be received.

WHO _____

10. Record results of verification on the application as they are determined. (If using a computer program, results will be indicated on a report of verification efforts.) Documentation will be attached to the application.

WHO _____

11. Send termination notice to applicants determined ineligible due to verification. (Terminate benefits 10 days from date of notice if benefits are decreased from free or reduced to paid. If the change in benefits is from free to reduced, notify household and change benefits within 10 days from date of determination).

WHO _____ WHEN (Upon determination)

12. Send notice of change in benefit category due to verification. (Change benefits 10 days from date of notice.)

WHO _____ WHEN (Upon determination)

13. Send notice of termination of benefits due to failure to respond to verification. (Benefits terminate 10 days from date of notice.)

WHO _____ WHEN

14. Program participants reapplying for benefits following termination notice **MUST** provide documentation of income for verification.

15. Track and record the number of students who reapplied and were reapproved for free or reduced meal benefits. (By February 15th)

16. Prepare and complete online verification report on CNP Web.

WHO _____ WHEN (By March 1st)

17. Retain all verification records for **three years**.

FOOD SERVICE
ACCOUNTABILITY PROCEDURES

CASH COLLECTIONS

1. The price charged for student and adult meals will be established by at the beginning of the school year. Prices for a la carte/snack bar items will be established by as needed. The price of a reduced price student breakfast will not exceed \$.30 and a reduced price student lunch will not exceed \$.40.
2. At the beginning of the school year, a change fund of _____ will be established for each cashier from funds in the _____ account.
3. Each cashier will be responsible for the security of the change fund and be covered by the school/district's insurance bond. The change fund will be safeguarded in the following manner:

WHO

DOES WHAT

WHEN

4. The medium of exchange (tickets, tokens, IDs, etc.) are safeguarded and distributed in the following manner:

Safeguard:

WHO

HOW

Distribution:

WHO

HOW

WHEN

5. The student's eligibility for free, reduced or paid meals is reflected on the medium of exchange in the following manner: Codes for free, reduced, paid. (**ATTACH** copies of medium of exchange)
6. A log will be maintained by _____ to record date of issuance of medium of exchange for students to record date of issuance of medium of exchange for students for free meals. (If using automated I.D. cards log will record for all students the I.D. number assigned, issuance date, student name and withdrawal or transfer date.)

(ATTACH COPY)

7. If using tickets as the medium of exchange, the tickets are prenumbered sequentially.

FOOD SERVICE
ACCOUNTABILITY PROCEDURES

8. If using a check-off system, a monthly roster is prepared for each class which records payments and meals served with appropriate coding for eligible free and reduced price students.

WHO WHEN

(ATTACH COPY)

9. A daily cash receipts report will be prepared by each cashier which is reconciled with meal counts and documents differences. Corrective action to reconcile differences is described, if needed.

(ATTACH COPY)

10. Describe procedure for recording cash in line for meals and/or a la carte if coded registers are not used.
11. If using cash registers, describe key board and codes.
12. If allowing student charges, describe procedure for recording charges and payment of charges.
13. Cash receipts are to be deposited daily (at least weekly). Deposit slip is signed by both preparer and verifier and retained for reconciliation with bank statement. (Give name of bank)

Prepared by:

Verified by:

Deposited by:

Records retained by:

14. Cash deposits are reconciled with bank statements and any discrepancies are investigated for correction.

WHO

WHEN

15. Tickets are to be retained for one year after the end of the school year in which they were used. All other records must be retained for five years.

FOOD SERVICE ACCOUNTABILITY PROCEDURES

ON-SITE REVIEWS

1. By February 1 of the school year, each program serving site will be reviewed by (Name) . The review will be conducted during the meal service in order to evaluate the meal counting and claiming practices. These reviews will be scheduled so that sites with new cafeteria managers, new administrators, large cafeteria employee turnover, and demonstrated meal count problems are reviewed early in the school year.
2. More comprehensive reviews to include such items as food preparation, ordering, storage, sanitation, etc., will be included at the discretion of the food service director.
3. When a on-site review discloses that problems exist, the cafeteria manager and reviewer will develop a corrective action plan to be implemented as quickly as possible. A second review will be conducted within 45 calendar days to ensure that the problems have been corrected.
4. If problems still exist after the second review, the food service director will take immediate appropriate action, including dismissal of personnel within the districts due process procedure, to ensure accuracy in meal counting and claiming at the site.
5. All on-site reviews will be documented to include date of review, review results, and name of reviewer, and be available for evidence of compliance to state and/or federal reviewers.

Attach copy of review form.

MEAL COUNTS AND REIMBURSEMENT CLAIM

1. Describe how each meal/milk is served to a child and identified as free, reduced or full price. (Ex: Students use tickets with number code 01 for free, 02 for paid, and 03 for reduced.)
2. Describe how free, reduced and full-price meals/milk are counted and recorded. (Ex: Food service staff counts tickets after conclusion of meal service and records number on summary report.)
3. Describe when point of service meal/milk counts are taken. (Ex: Students proceed through lunch line and present tickets to food service staff at end of line.)
4. Describe edit checks of daily report of meal counts. Who performs these checks? Edit checks include comparison of meals served by category with number eligible for benefits times the attendance factor.
5. Describe procedure for accounting for second meals purchased by a child. Procedure must ensure that only one meal per child is counted for reimbursement.

FOOD SERVICE ACCOUNTABILITY PROCEDURES

6. If sponsor has more than one site, describe how meal counts are consolidated. Who performs this task, when? What happens if edit checks are exceeded? (Attach copy of consolidated report form.)
7. Describe preparation of claim for reimbursement. Who does it? When? Who signs it? Also describe procedures for filing an amended claim.
8. Describe procedure for handling lost, stolen, misused tickets.

STAFF TRAINING

Describe procedures for training of personnel involved in meal counting, claiming activities, and cash handling. Training should include:

1. Orientation; how the person fits into the overall lunch program.
2. The meal pattern, Offer vs. Serve, and identifying a reimbursable meal.
3. Completion of the daily/weekly report.
4. Cash register/computer operations, cash handling.
5. Understanding the medium of exchange.
6. Free and reduced price meal procedures, including those for prepaid meals.
7. Procedures for charging meals/charge policy.
8. Procedures for handling lost, stolen, misused tickets/policy.
9. Procedures for recording second meals.
10. Adult meal service.
11. A la carte, snack bar procedures.
12. The physical set up of the cashiering/meal count station.

Identify visual aids and materials used in the training session.

Training will be given at the beginning of the school year and periodically as needed.

Training will be documented to include date, participants, and agenda items covered. This documentation will be available to state and/or federal reviewers.

FOOD SERVICE TRAINING

SCHOOL

TOPICS

____ Free/Reduced Applications

____ Free/Reduced Verification

____ Cash Collections

____ Meal Counts/Reimbursement

____ Meal Pattern/Production

____ Other

PROGRAMS

____ National School Lunch

____ School Breakfast

DATE:

TIME: _____ TO

PLACE:

TRAINER(S):

NUMBER OF PEOPLE ATTENDING:

GENERAL SUBJECT AREAS COVERED:

COMMENTS:

To be completed for all food service training programs and meetings in which all or part of presentation was made by food service staff.

FOOD SERVICE TRAINING ATTENDANCE ROSTER

Date_____

Event _____

Name of Individual

Name of School

Position

[illegible]

On-Site School Review of Counting and Claiming Procedures

School Name _____

Date of Review _____ First Review Second Review

Signature of Reviewing Official _____

Rosters:

The purpose in reviewing each school's system for maintaining and updating rosters (lists of students and their respective eligibility) is to be assured that changes in eligibility are accurately and promptly recorded. If a child's eligibility is wrong on the roster, then meals served to the child are claimed in the wrong category.

	Yes	No	N/A	Comments
1. If a school is notified by the district office of changes in eligibility, be prepared to verify that changes were correctly noted on the roster. Did the school accurately update roster?				
2. If applications are maintained at the school compare a sample of approved applications to the eligibility status noted on the roster. Does the roster correctly identify the eligibility categories approved?				
3. Are the dates when a child withdraws/transfers or when eligibility changed clearly and accurately noted on the roster?				

Meal Count System:

The purpose in observing the school's meal count system is to ensure that, at each key point, the system is operating as planned and that meals served are accurately recorded by category (free, reduced-price, paid) and at the point each child is known to have received a reimbursable meal. You will need to observe staff in action, e.g., cashiers and managers.

At the Point of Service	Yes	No	N/A	Comments
4. Are meals counted by category at the point of service?				
5. Are only meals that are priced as a unit and contain the required number of components recorded for reimbursement?				
6. Are a la carte items excluded as a reimbursable meal even if together they comprise a complete 3, 4, or 5 component meal? (the answer should be yes because the items are not priced as a unit and not available to the needy children free or at the reduced price)				

At the Point of Service (cont.)	Yes	No	N/A	Comments
7. Are charged meals reported and claimed the day the meals are served?				
8. Is the school following procedures to ensure that only one reimbursable meal per child per day is claimed? (it must be ensured that seconds are not claimed even when there are multiple serving stations)				
9. Are reimbursable meals recorded at the point they are served to student workers?				
10. Are meals served to student workers claimed in the appropriate free, reduced-price or paid categories?				
Meal Count Consolidation				
11. Do cashiers add meals served by category correctly? (tray or cash counts cannot be used)				
12. Are counts from all stations correctly consolidated by type? (tray or cash counts cannot be used)				
Overt-Identification				
13. Is the identification of free/reduced-price status adequately concealed during ticket issuance, payment collection and the meal service?				
Written Procedures				
14. Is the meal count system in use the one approved by the state agency?				
15. Are the written procedures to describe the meal count system accurate and useful for school staff?				
16. Are procedures in place to ensure the system does not break down when key staff are absent?				

AFTER SCHOOL CARE SNACK PROGRAM SITE REVIEW

Exhibit I

NOTE: To be completed twice per year. Once during the first four weeks of operation, and one other time during the school year.

Sponsor: _____

Site Contact: _____
Name and Title

Site Address: _____

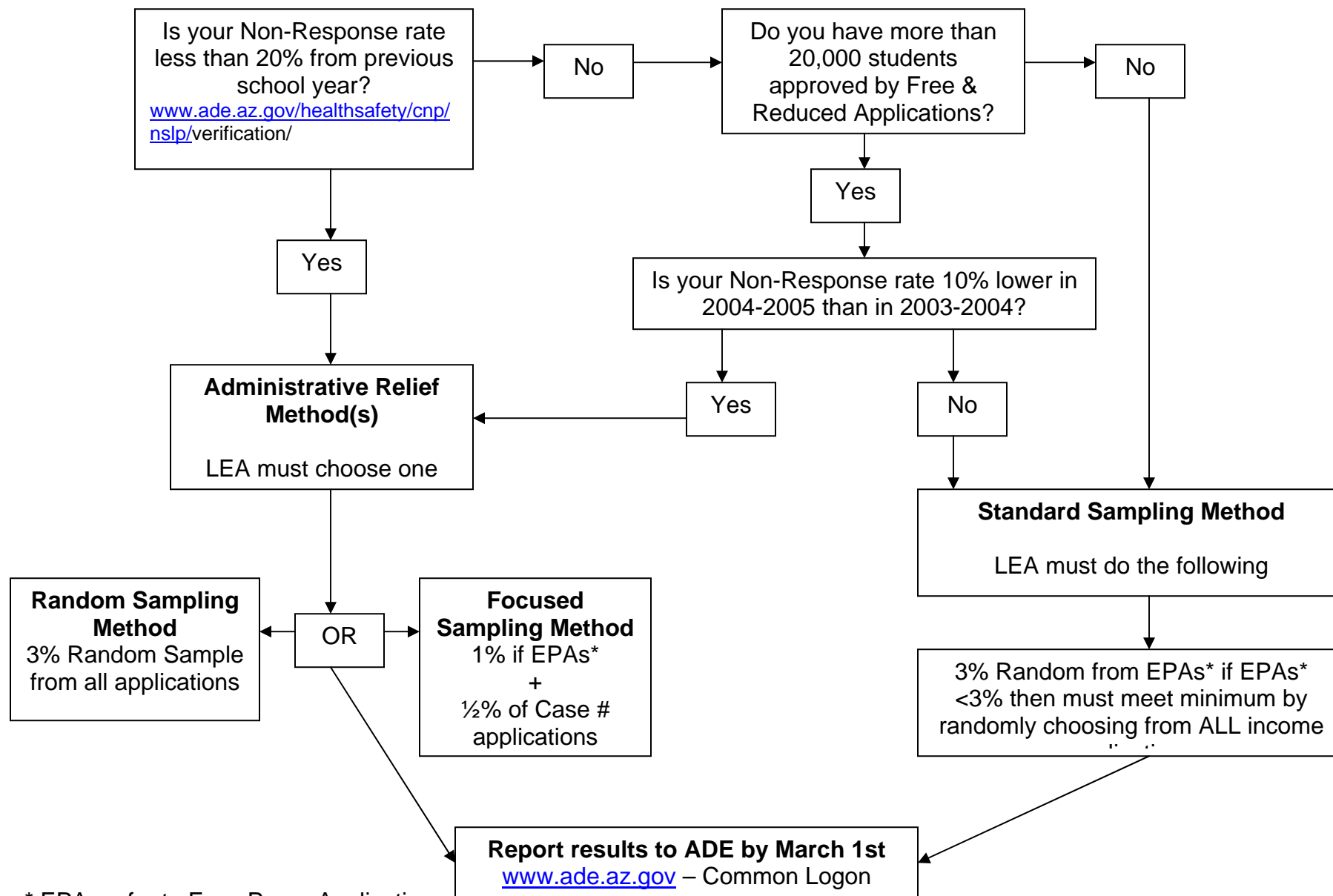
Date of Review: _____ **Today's attendance:** _____

Average Daily Participation: _____

Total # of snacks served _____

Yes	No	N/A	Explain any "NO" answers below
_____	_____	_____	1. For sites with greater than 50% NSLP free/reduced applications is there a head count of children receiving snacks?
_____	_____	_____	2. For sites with fewer than 50% NSLP free/reduced applications is there an accurate point of service?
_____	_____	_____	3. Do the snacks meet the meal pattern requirements?
_____	_____	_____	4. Are no more than two desserts offered per week?
_____	_____	_____	5. Are food production records maintained?
_____	_____	_____	6. Do the portion sizes meet the meal pattern requirements?
_____	_____	_____	7. Are only snacks that contain the required number of components recorded for reimbursement?
_____	_____	_____	8. Is no more than one snack per child/day counted and claimed?
_____	_____	_____	9. Are sanitary procedures used in handling food?
_____	_____	_____	10. Has staff training on proper food handling procedures been provided?

Determining Your Verification Method and Sampling Requirement



* EPAs refer to Error Prone Applications